



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

February 02, 2009

Reply to  
Attn Of: ETPA-088

Ref: 06-083-AFS

Forrest Cole, Forest Supervisor  
Tongass National Forest  
Federal Building  
Ketchikan, AK 99901

Dear Mr. Cole:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the proposed **Central Kupreanof Timber Sale** on Kupreanof Island, Petersburg Ranger District, Tongass National Forest, in southeast Alaska (CEQ No. 20080513). Our review has been conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS analyzes four alternatives including the no action alternative (Alternative 1) and the proposed action (Alternative 2) based on timber harvest in the Central Kupreanof project area on Kupreanof Island. Alternative 2 proposes harvest of 46.8 million board feet (mmb) on 2,506 acres, up to 7.3 miles of new roads and up to 3.9 miles of temporary roads, 4 additional Class I road crossings, and 434 acres of harvest within inventoried roadless areas (IRA). The silviculture treatments include 2,063 acres of clear cut and 2,427 acres of old growth harvest. The harvested timber would be transferred to the existing Little Hamilton log transfer facility (LTF). The decision on whether or not to harvest timber from this area, and if so, the manner in which it should be harvested, will be made by the Tongass Forest Supervisor in accordance with Forest Plan goals, objectives, and desired conditions.

The EIS does a good job discussing the issues of concern, illustrating harvest units by providing unit card figures (Appendix B), and explaining the relationship to other applicable laws including tiering from the 2008 Forest Plan. We believe that the alternatives strive to respond to the significant issues associated with the project and we understand the need to balance forest economics with resource protection. Alternative 2 balances economics and resource protection and appears to have a moderate amount of potential environmental impacts. Alternative 3 has the greatest potential impacts and Alternative 4 has the least potential impacts.

Due to concerns about potential impacts to essential fish habitat and water quality from increased harvest activities, we have given a rating of EC-2 (Environmental Concerns - Insufficient Information) to this project. An explanation of the EPA rating system and detailed comments are attached to this letter.

In general, we request that the Forest Service employ the following recommendations in the Final EIS and Record of Decision for the Central Kupreanof Timber Sale:

- Minimize or avoid construction of new roads.
- Reconsider alternate extraction methods and minimize ground-based extraction where feasible.
- Consider methods other than even-aged treatment (clearcut), particularly in the Scenic Viewshed LUD and in sensitive watersheds.
- Develop monitoring plans, including in-stream measures of water quality.
- Protect biological diversity, especially that of critical habitat or unique vegetation.
- Prohibit activities in areas where high hazard/high mass movement index soils are present, or in watersheds identified as most sensitive.

Thank you for the opportunity to comment on this draft EIS. If you would like to discuss our comments, please contact Lynne McWhorter at (206) 553-0205 or by electronic mail at [mcwhorter.lynne@epa.gov](mailto:mcwhorter.lynne@epa.gov) or me at (206) 553-1601.

Sincerely,

/s/

Christine Reichgott, Manager  
NEPA Review Unit

## **Attachment 1**

### **EPA Comments on Kupreanof Timber Sale, Tongass National Forest, DEIS**

#### **Water Quality**

The EIS states that direct effects may include localized increase in annual water yield, increased peak flows, and altered timing of water delivery in streams from harvest activities. Harvest activities include clear cut of 266 acres on soils rated as high hazard for mass movement. Although, BMPs will be used to minimize adverse effects including stream buffers, these activities can introduce sediments to stream systems and alter thermal processes, consequently degrading water quality, and impacting fish and their habitat. We support the required stream buffers and minimizing road construction, clear cut prescriptions, and harvesting areas with high landslide potential.

Section 303(d) of the Clean Water Act (CWA) requires identification of those waterbodies which are not meeting or not likely to meet State water quality standards. The EIS states that Hamilton Bay was placed on the 303(d) list of impaired water bodies for debris from log transferring activities in 1996 and we are pleased to see that surveys resulted in the removal from the list in 2002/2003. The EIS discusses that barging logs would have less effect on marine species versus rafting logs, which can diminish habitat for managed marine species and their prey due to bark accumulation. It is not clear which transportation mechanism will be used for what quantity of logs. We support barging logs and avoiding impacts to marine species and recommend clarifying how much of the harvest timber will be transported by which mechanism in a separate section and including a figure illustrating the transportation route in marine waters.

Antidegradation provisions of the CWA apply to those water bodies where water quality standards are currently being met. This provision prohibits degrading the water quality unless an analysis shows that important economic and social development necessitates degrading water quality. The EIS should explain how the antidegradation provisions would be met for the proposed project.

#### **Essential Fish Habitat**

The project area includes federally managed species of pink, chum, coho, and sockeye as well as populations of Dolly Varden, cutthroat trout, and steelhead. Streams on the Tongass National Forest are divided into value classes from I to IV indicating levels of habitat use by fish populations. Class I indicates streams with high fishery habitat values and there are 369 miles of Class I streams in the project area. The EIS states that increased sediment delivery to streams during construction activities may affect individual fish by reducing oxygen levels to developing eggs in spawning gravels and/or trapping emerging fry in the gravel, but the effect is expected to be short-term (48 hours or less) and the use of seasonal timing restrictions will minimize impacts to fish. In addition to protecting high value habitat, another key component of protecting fish populations is culverts that allow for fish passage. The EIS states that there are 61 fish crossing characterized as red (high certainty of not providing juvenile fish passage at all desired stream flows). The risk of sediment delivery to streams is higher at road crossings and increases the potential for culverts to become plugged with sediment and debris. The proposal includes the addition of two culverts and replacement of two culverts in Class I streams and the removal of

one red culvert within 10 years of timber harvest. We support the Forest Service analysis and characterization of streams and planning efforts to protect aquatic resources. However, we believe that Alternative 4 more adequately protects aquatic resources by minimizing additional roads and increasing the removal or modification of more than one red culvert.

### **Log Transfer Facility**

The EIS states that the LTF is still operating under a valid National Pollutant Discharge Elimination System permit (NPDES). On October 31, 2008, the Environmental Protection Agency (EPA) formally approved the state's NPDES Program application. The state's approved program will be called the Alaska Pollutant Discharge Elimination System (APDES) Program. We recommend that the final EIS include a discussion of this shift and whether or not this may affect the current NPDES permit.

### **Habitat**

The project area includes four old growth areas and the proposed project includes harvest of 2,427 acres of old growth habitat in three of the reserves. The EIS does a good job explaining the resource analysis area for wildlife through the use of biogeographic provinces (BP), which are geographic areas defined by the Alaska Department of Fish and Game to manage wildlife populations. This analysis tiers to the productive old growth (POG) forest habitat in the Forest Plan. The EIS states that there would be a reduction of approximately 4.2 percent POG in the project area and should not have adverse effects on wildlife. The EIS also includes a cumulative effect analysis of private land adjacent to Forest Service land and states that intensive harvest in the past occurred on these lands. We support the analysis and minimizing harvest of old growth stands that support wildlife populations. In particular we recommend maintaining legacy characteristics and not conducting even age stand cuts in POG areas. We also recommend that the EIS discuss any agreements that the Forest Service has with private land owners to promote stewardship or opportunities for agreements so that watershed function and habitat can be maintained across the landscape.

### **Invasive Species**

Invasive species can aggressively spread into areas altered by road construction and harvest activities. Nationally, as well as in Alaska, the establishment of invasive nuisance species has rapidly become an issue of environmental and economic significance. EPA strongly supports weed control and management during and after harvest activities. The EIS should provide a discussion to comply with the Executive Order (EO 13112) on invasive species. The status of noxious weed projects in the project area should be described, and weed monitoring and control features should be identified.

### **Monitoring**

As discussed above, the proposed project has the potential to impact water quality, fish, and habitat. Predicting the severity of these impacts and devising effective mitigation measures remains an imprecise science. Monitoring is a necessary and crucial element in identifying and understanding the consequences of actions. In this case, monitoring is needed to evaluate compliance with the Forest Plan and effectiveness of Best Management Practices. The EIS discusses monitoring and refers to the Forest Plan as well as the BMPs associated with the unit cards in Appendix B. However, we believe that the EIS does not include an appropriate level of detail about the proposed monitoring plan. Clear monitoring goals and objectives should be identified such as what questions are to be answered; what parameters are to be monitored; where

and when monitoring will take place; who will be responsible; how the information will be evaluated; what actions (contingencies, adaptive management, corrections to future actions) will be taken based on the information; and how the public can get information on mitigation effectiveness and monitoring results. We recommend that general components from the monitoring plan be included such as how monitoring is conducted and frequency. We also recommend that a discussion of the results of past monitoring efforts in the project area and how they affected management direction be explained in order to understand the accuracy of past predictions and success of monitoring efforts. .

### **Climate change**

Currently, there are concerns that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. The EIS states that climate change is not essential for a reasonable choice among alternatives considered in this analysis. EPA believes that the cumulative effects analysis in the NEPA document should include changes to resources that can reasonably be anticipated due to climate change that may have bearing on aspects of the project (e.g. changes in hydrology that may affect siting of roads or sizing of culverts). Therefore, we recommend that the EIS consider how resources affected by climate change could potentially influence the proposed project and vice versa, especially within sensitive areas.

### **Consultation with Tribal Governments**

The EIS states that the Forest Service consulted with the Organized Village of Kake (OVK) and the Wrangell Cooperative Association (WCA), the tribal groups that are culturally affiliated with the project area. We appreciate the inclusion of the discussion of government to government consultation and we support activities that minimize impacts to the area's Native Alaskan communities. If continuing government-to-government dialog with potentially impacted Tribes reveals that the proposed project will have impacts on traditional resources of Alaska Native Tribes or their members, the final EIS should clearly specify which resources will be impacted and what mitigation measures will be included to minimize impacts.